

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

UNITED STATES OF AMERICA

CASE NO: 25-CR-20035

v.

JOSE LUIS VILLARES,
Defendant.

/

DEFENDANT'S JOSE LUIS VILLARES MOTION TO JOIN IN AMENDED MOTION TO
PRESERVE AND SCHEDULE DEPOSITIONS BY KEINER CICILIA RODRIGUEZ
[D.E.33]

The Defendant, by and through undersigned counsel, hereby files this Motion to Join in Amended Motion to Preserve and Schedule Depositions filed by Counsel for Keiner Cicilia Rodriguez [D.E. 33] and states the following as such:

Defendants are charged in a 26 count Indictment. Count 1 charges a conspiracy to knowingly and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of the law, did transport and move such alien within the United States, by means of transportation and move such alien within the United States. The Complaint [D.E 1] specifically alleges that the Defendant used a U-Haul to transport undocumented aliens who originated from China, Ecuador and Brazil and that some of the undocumented individuals made statements.

The Defendant requests that same relief and supports the position of the alleged co-conspirator Keiner Cicilia Rodriguez to depose the witnesses identified in the complaint in order to preserve their testimony for trial.

Defendant Jose Luis Villares joins in the legal standard presented by Counsel for Keiner Cicilia Rodriguez in their motion. [D.E.33]

Undersigned Counsel has conferred with AUSA Andres Chincilla who expressed the same position as noted in Government's Response to Motion by USA as to Keiner Cicilia Rodriguez [D.E. 34]

WHEREFORE, Defendant Jose Luis Villares request that this Honorable Court enter an Order authorizing the deposition, under the procedures set forth in Rule 15(a)-(g) of the Federal Rules of Criminal Procedure, of the undocumented aliens referred to as Y.Y., Y.L., E.C., H.T., and O.P. as previously ordered by this Honorable Court in [D.E. 43].

Respectfully Submitted,

By: /s/ Nayib Hassan
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CERTIFICATE OF SERVICE

I HEREBY certify that on February 28, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

/s/ Nayib Hassan